

November 28, 2005

Federal Communications Commission  
445 12<sup>th</sup> St SW  
Washington, D.C. 20554

**Re: WC Docket No. 05-196 – Interconnected VoIP 911 Compliance Letter**  
Filed via ECFS

To the Commission:

This letter provides information regarding iOnosphere, Inc.'s (the "Company") compliance with the 911 requirements as established by the Commission. iOnosphere, Inc. is a wholesaler of VoIP telephone service to resellers ("resellers") and do not own, serve or sell to the end user ("subscriber") of the VoIP telephone service.

911 Solution – The Company has entered into an agreement with Telefinity Dash 911 in order to provide 911 services (V9-1-1 solution) to all of its subscribers in order to comply with the VoIP 911 Order issued by the Commission. The Company has not specifically quantified, on a percentage basis, the number of subscribers to be provided 911 services according to the VoIP 911 Order. The verification of subscriber Registered Locations as to PSAP coverage area and Telefinity's rollout of 911 services by PSAP area will accurately determine the percentage of subscribers to be provided 911 services as defined by the VoIP 911 Order.

The V9-1-1™ solution enabled by Telefinity Dash911 through Intrado provides a true E9-1-1 solution for VoIP Service Providers. The solution provided by the Telefinity Dash911 affiliation with Intrado enables a comprehensive approach to delivering E9-1-1 for VoIP by handling all aspects of the VoIP 9-1-1 call delivery and VoIP Positioning Center (VPC) functionality such as Master Street Address Guide (MSAG) Address Validation, ESQK management, Geocoding, real-time provisioning and routing determination. Included in the Service for the VSP is also the call delivery component to ensure the 9-1-1 call reaches the appropriate selective router and Public Safety Answering Point (PSAP). Specifically, Intrado manages the VPC functionality and the Call Delivery component on behalf of Telefinity Dash 911 thereby enabling VSPs to take advantage of a full end-to-end solution from one E911 service provider.

The only VSP requirements for delivery of the V9-1-1 service are the ongoing delivery of address and telephone number information to Telefinity Dash911 via a real-time interface and the PSTN connectivity to the Telefinity Dash911 network to enable live 9-1-1 call delivery. The real-time interface is via a SOAP API programming interface supplied by Telefinity Dash 911 to its VSP customers, or, a branded website interface provided by Telefinity Dash911 to its VSP customers.

911 Routing Information/Connectivity to Wireline E911 Network - The Company currently is not transmitting, as specified in Paragraph 42 of the VOIP 911 Order, “all 911 calls to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority utilizing the Selective Router, the trunk line(s) between the Selective Router and the PSAP, and such other elements of the Wireline E911 Network as are necessary in those areas where Selective Routers are utilized.” The Company is not transmitting all 911 calls as specified by the VoIP 911 Order due to: i) the Company’s first vendor (Level 3 Communications) utilized for 911 services was unable to provide 911 services in certain areas in which the Company obtained subscribers; ii) under the existing PSAP infrastructure/network, the Company does not have the resources to obtain access to the technology and data required to provide E911 services to all its subscribers without the use of a third party provider; and iii) the Company needs more time to implement 911 services to all its subscribers through a contract executed with Telefinity Dash 911. As of November 28, 2005, the Company is not directly interconnected with any Selective Routers, but will have indirect access to Selective Routers through the services to be provided by Telefinity Dash911.

The Company, through Telefinity Dash911 VSP is expected to have indirect access to 154 E9-1-1 Selective Routers and as outlined in the attachments: i) Exhibit 1 - Major Market Deployment Map; and ii) Exhibit 2 VoIP Deployment Plan, reflecting the major market deployment schedules. Note: The market deployment map represent major markets where Intrado has reported to Telefinity Dash911 that it has connectivity to at least 1 selective router, ALI steering and the ability to populate ALI.

Transmission of ANI and Registered Location Information - As of this date and for some subscribers, the Company has utilized Level 3 Communications to provide E911 services, when available. For subscribers that E911 is provided, the Company believes that ANI and Registered Location



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information is transmitted via Wireline E911 to all answering points capable of receiving and processing this information. As of November 28, 2005, approximately 20% of the Company's subscribers are being provided E911 through the Company's contract with Level 3 Communications.

The Company plans to use Telefinity Dash911 to provide 911 services for its subscribers not currently receiving E911 and or all of its subscribers. There are unique deployment circumstances in areas of the US and Puerto Rico that operate off E9-1-1 Selective Routers, but will not meet the full FCC mandate. Telefinity Dash911 has indicated that Intrado has noted that there are currently four (4) States and a Territory that will have native Selective Routing functionality but will only provide Automatic Number Identification (ANI) only service to the PSAP. The following information explains the circumstances within these areas:

**New Jersey** - In the State of New Jersey Intrado has obtained permission from the State to deploy a voice-only service which includes the call-taker receiving ANI on the VoIP 911 caller. The State ALI system is not capable of full dynamic ALI updates and will require an upgrade. New Jersey represents 3% of the total US population.

**Ohio** - To date, Ohio has not granted permission to Intrado to deploy a voice-only solution. The State ALI system is not capable of full dynamic ALI update. Ohio represents 4% of the total US population.

**Hawaii** - To date, Hawaii has not granted Intrado permission to deploy a voice-only solution. The ALI systems serving Hawaii are not capable of full dynamic ALI update. Hawaii represents 5% of the total US population

**Puerto Rico** - To date, Puerto Rico has not granted permission to Intrado to deploy a voice-only solution. The ALI systems are not capable of full dynamic ALI update. Puerto Rico represents 3% of the total US population

911 Coverage – The Company is providing E911 service for 20% of its subscribers through Level 3 Communications. The Company recently executed an agreement with Telefinity Dash 911 to provide 911 service for its subscribers to meet the requirements per the VOIP 911 Order. The implementation of E911 to subscribers through Telefinity Dash 911 has not been completed as of this date. The Telefinity Dash 911 E911 solution uses

Intrado as a backbone supplier and as such Intrado is the VPC and is working on nationwide native VoIP E9-1-1 delivery in accordance with the Commission Order. The initial PSAP deployments are targeted in major metropolitan areas throughout the US based on the VSP customer subscriber base priorities. The attached Exhibit 1 - *Major Market Deployment Map*, which corresponds with MSAs, identifies regions within the subscriber territory that have connectivity to at least one Selective Router, ALI steering capabilities; ANI and the ability to populate ALI. Telefinity Dash 911 has advised us that these areas are planned for deployments by December 31, 2005; March 31, 2006 and June 30, 2006. This intention of this map is to demonstrate FCC compliance for the November 28<sup>th</sup> requirements and the future deployment strategy.

Obtaining Initial Registered Location Information – The Company is required, by its third party E911 provider, to obtain a Registered Location for each subscriber upon the activation of the VOIP service, where E911 is available. For subscribers not currently being offered E911, the Company will be required to obtain Registered Location information as these subscribers are provided 911 services. The Company has obtained Registered Location information for all subscribers in which it is providing E911 service.

Obtaining Updated Registered Location Information – Upon implementation of the 911 services to be provided by Telefinity Dash 911 to the Company's subscribers, the subscribers will, at a minimum have the following methods to update their Registered Locations: i) a toll free telephone number which can be dialed using the same equipment that the subscriber uses to access their interconnected VoIP service; and ii) a web based link/portal to allow the subscriber to change their Registered Location.

Technical Solution for Nomadic Subscribers – By using Telefinity Dash911's E911 for VoIP service, the Company expects to be able to route VoIP emergency calls from our VoIP network to Telefinity Dash 911's Intrado Network or alternative 3rd party network for delivery to the appropriate Selective Router and then on to the geographically appropriate Public Safety Answering Point (PSAP) via the native 9-1-1 infrastructure. The services will provide a "native" 9-1-1 solution for routing VoIP 9-1-1 calls from both in-region and out-of-region telephone numbers (TNs) to the most geographically appropriate PSAP. The V9-1-1 solution enables full support of nomadic usage of VoIP if the user updates their address information upon connecting to the Internet at a new location/address. Through the Telefinity Dash 911 interface, the 9-1-1 solution will enable the near real-time provisioning (Geocoding and MSAG Validation) of the newly-provisioned address and



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make available (assuming no errors) that a particular user's information for delivery to the PSAP within an average of 15 minutes of receipt of the new Registered Location address information.

Telefinity Dash 911 recognizes the universal desire to remove the user interaction and self-provisioning component of the current 9-1-1 solution. To that end, we understand that Telefinity Dash 911, along with Intrado, are actively working a number of "location determination" technologies.

Sincerely

Tom Bishop  
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iOnosphere, Inc.